

KEREN E. GESUND, ESQ.
Nevada Bar No. 10881
GESUND & PAILET, LLC
5550 Painted Mirage Rd.
Suite 320
Las Vegas, NV 89149
Tel: (702) 300-1180
Fax: (504) 265-9492
keren@gp-nola.com

Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NICOLE DIANE LA CARIA, on behalf of
herself and all others similarly situated;

Plaintiff,

vs.

NORTHSTAR LOCATION SERVICES, LLC,
A New York limited liability company, and
JOHN DOES 1-10.

Defendant.

Case No.: 2:18-cv-00317-GMN-DJA

**NOTICE OF PENDING SETTLEMENT
AND JOINT STIPULATION TO STAY
PROCEEDINGS**

Plaintiff Nicole Diane La Caria and Defendant Northstar Location Services, LLC (“Northstar”) (collectively, the “Parties”) hereby notify the Court that the Parties have reached an agreement to settle all disputes and claims raised between them in this litigation.

The Parties therefore submit this stipulation to stay, for sixty (60) days, all existing deadlines and proceedings, including Plaintiff’s deadline to respond to Northstar’s Motion for Certification of Interlocutory Appeal and For Stay of Proceedings filed July 24, 2020. (Dkt. No. 69). The purpose of this stay is to allow the Parties sufficient time to set forth in greater detail the terms of the Parties’ settlement, as well as to allow Plaintiff’s counsel time to file a motion seeking the Court’s preliminary approval of the settlement terms.

The forgoing stipulation to stay the proceedings is made in good faith to enable the Parties to engage in meaningful settlement dialogue and not for the purpose of delay.

DATED this 30th day of July, 2020

GESUND & PAILET, LLC

By: /s/ Keren E. Gesund, Esq.
KEREN E. GESUND, ESQ.
Nevada Bar No. 10881
5550 Painted Mirage Road
Suite 320
Las Vegas, NV 89149
Telephone: (702) 300-1180
Fax: (504) 265-9492
keren@gp-nola.com

O. Randolph Bragg
Horwitz, Horwitz & Associates
25 East Washington Street, Suite 900
Chicago, IL 60602
(312) 372-8822
(312) 372-1673 - Fax
rand@horwitzlaw.com
Attorneys for Plaintiff

DATED this 30th day of July, 2020

GORDON REES SCULLY MANSUKHANI,
LLP


By: /s/ Craig J. Mariam, Esq.
CRAIG J. MARIAM, ESQ.
Nevada Bar No. 10926
300 S. 4th Street
Suite 1550
Las Vegas, NV 89101
Telephone: (702) 577-9333
Facsimile: (877) 306-0043
cmariam@grsm.com
*Attorney for Northstar Location
Services, LLC*

ORDER

IT IS HEREBY ORDERED that the above Stipulation to Stay Proceedings, (ECF No. 71), is **GRANTED**. All currently pending deadlines are **STAYED**.

IT IS FURTHER ORDERED that Plaintiffs shall have until October 6, 2020, to file a motion seeking the Court's preliminary approval of settlement terms or a status report explaining why a motion has not been filed.

DATED this 11 day of August, 2020.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT